

TAD:MEF

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

COMPLAINT

- against -

No. 18-M-543

ALFREDO LUNA,

(21 U.S.C. § 841(a))

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

FERNANDO ESPINDOLA, being duly sworn, deposes and states that he is a Task Force Officer with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about June 13, 2018, within the Eastern District of New York, the defendant ALFREDO LUNA, together with others, did knowingly and intentionally possess with intent to distribute a controlled substance, which offense involved 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. § 841(a).

(Title 21, United States Code, Section 841(a))

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about May 9, 2018, a confidential source, who has previously provided reliable information to law enforcement ("CS-1"), obtained information from a third party regarding a conspiracy to import narcotics into New York. CS-1 was informed that an

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

individual, later identified as the defendant ALFREDO LUNA, would be traveling to New York with approximately six pounds of crystal methamphetamine in or about June 2018.

2. On or about June 13, 2018, CS-1 obtained a phone number for the defendant ALFREDO LUNA. CS-1 was informed that the total price for six pounds of methamphetamine was approximately \$54,000, but that CS-1 should only pay LUNA \$20,000 at the outset.

3. On or about June 13, 2018 at or around 4:20 p.m., CS-1 called the defendant ALFREDO LUNA several times to coordinate a time and place to meet. The defendant instructed CS-1 to come to the Fairfield Inn at 156-08 Rockaway Boulevard, Queens, New York (the "Delivery Location").

4. At approximately 8:30 p.m. on June 13, 2018, CS-1 arrived at the Delivery Location and called the defendant ALFREDO LUNA, who then gave CS-1 a room number at which the two could meet. CS-1 went to the defendant's room, and the defendant showed CS-1 two packages of what the defendant described as "ice," and offered to cut the packages open in the hotel room so that CS-1 could further inspect them. CS-1 declined to have the packages opened and asked the defendant to bring the packages out to the taxi CS-1 has taken to the Delivery Location, where CS-1 had money to pay for the packages. The defendant questioned which denominations of bills CS-1 would use to pay for the packages. The defendant placed the packages inside a black duffle bag, and the defendant and CS-1 left the hotel room.

5. CS-1 and the defendant ALFREDO LUNA went outside to the parking lot of the Delivery Location. The defendant got into the back seat of CS-1's taxi with the duffle bag containing narcotics, where CS-1 had left a bag of sham money.² CS-1 waited outside of the taxi

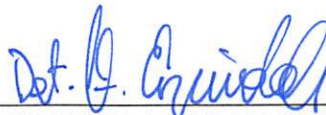
² The "sham money" used consisted of two separate stacks of imitation U.S. Currency in various

while the defendant inspected the bag of sham money. At this time, I along with other HSI agents approached CS-1's taxi and opened the rear passenger door, where I saw the defendant inspecting the bag of sham money. At this time, I and other law enforcement officers arrested the defendant.

6. The two packages were weighed, and the gross total weight was 3.11 kilograms.

7. The two packages were also field tested, the results of which were positive for methamphetamine.

WHEREFORE, your deponent respectfully requests that the defendant ALFREDO LUNA be dealt with according to law.



FERNANDO ESPINDOLA
Task Force Officer
United States Department of Homeland Security,
Homeland Security Investigations

Sworn to before me this
14th day of June, 2018

THE HONORABLE STEVEN L. TISCIONE
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK

denominations, including \$20 and \$100 bills. One stack was wrapped in cellophane and the other was wrapped in a food-saver bag.